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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 14 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Toll Free Service Access Codes) CC Docket No. 95-155

REPLY

On May 27, 1997, Sprint filed a Petition for Reconsideration and Clarification of the Commission's April 11, 1997 *Second Report and Order* in the above-captioned proceeding. In that Petition, Sprint explained that the Commission's requirement that toll free service providers have an identified customer before reserving a toll free code is cumbersome and hampers sales efforts. Sprint recommended that the Commission instead adopt a requirement that RespOrgs have an identified subscriber for a toll free number by the expiration of the 45-day reservation period. As Sprint demonstrated in its petition, this alternative rule serves the Commission's goal of preventing warehousing as effectively and more efficiently than the existing rule. Sprint also requested that the Commission clarify that there are certain situations in which re-reservation of a toll free number at the expiration of the 45-day reservation period, and of a number which has just moved from disconnect to spare status, are permissible.

Two of the three parties which filed comments endorsed Sprint's recommended change to the Commission's rules. MCI, for example, states (p. 4) that "[m]aintenance of a pool of numbers for customer choice and immediate availability is a central part of toll free marketing and sales practices. Moreover, the fact that numbers are immediately available for selection by customers saves valuable time in the sales process." Cable &

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Wireless similarly notes (pp. 2-3) that allowing service providers to maintain an inventory of toll free numbers would enable them to “fulfill a customer’s emergency request for toll free numbers faster” and that batch processing of toll free number requests would lessen stress on data links.

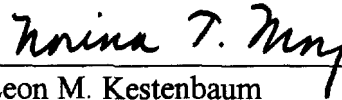
MCI (p. 5) and Cable & Wireless (p. 4) also support Sprint’s request that the Commission clarify that there are certain situations in which re-reservation of a toll free number is allowable, and that DSMI, the current toll free administrator, must be given clear guidelines for reporting alleged warehousing activity. MCI and Cable & Wireless agree that there may be legitimate situations in which a disconnected number should be reactivated for the same customer (*e.g.*, upon resolution of a billing dispute), and that the Commission should clarify that re-activation of a number for the same customer who previously held that number is not a *per se* violation of the Commission’s prohibition on warehousing toll free numbers.

Only US West opposes Sprint’s Petition, stating (p. 3) that if all RespOrgs reserved numbers without first having an identified subscriber, “large blocks of toll-free numbers would be unavailable.” However, there are limits on the total quantity of numbers each RespOrg may reserve, and the 45-day reservation interval would still apply. These limits ensure that any increase in the quantity of unavailable numbers, and any increase in the time in which those numbers are unavailable, will be almost negligible. Thus, Sprint’s proposal is unlikely to significantly or permanently decrease the pool of available numbers. US West does not deny that Sprint’s proposal will facilitate sales of toll free service, more easily accommodate consumer needs, and ease congestion on SMS data links (by allowing batch processing rather than individual number requests).

Because the benefits of Sprint's proposal outweigh the minor effect on overall availability of toll free numbers, the Commission should grant Sprint's petition for reconsideration.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY, L.P.

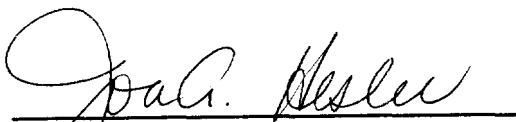
A handwritten signature in cursive script, reading "Norina T. Moy", is written over a horizontal line.

Leon M. Kestenbaum
Norina T. Moy
1850 M St., N.W., Suite 1110
Washington, D.C. 20036
(202) 857-1030

July 14, 1997

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Sprint Communications Co. LP was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 14th day of July, 1997 to the parties on the attached service list:


Joan A. Hesler

Regina Keeney, Chief
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W.
Washington, D.C. 20554

Kathleen Levitz
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W.
Washington, D.C. 20554

International Transcription
Service
1919 M Street, N.W.
Washington, D.C. 20554

Christopher G. McCann
Vice President
1-800 Flowers
1600 Stewart Avenue
Westbury, NY 11590

Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard
& Civiletti
1200 New York Ave., N.W.
Suite 1100
Washington, D.C. 20005

Genevieve Morelli
Vice President
ComPTel
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036

Mark C Rosenblum
* Peter H. Jacoby
Judy Sello
AT&T
Room 3244J1
295 No. Maple Ridge Ave.
Basking Ridge, NJ 07920

Charles H. Helein
Helein & Associates
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Susan M. Miller
Vice President and General
Counsel
ATIS
1200 G Street, N.W.
Suite 500
Washington, D.C. 20005

Douglas W. Kinkoph
Director, Regulatory/Legislative
Affairs
LCI International, Inc.
8180 Greensboro Drive
Suite 800
McLean, VA 22102

Richard S. Whitt
Director, Federal Regulatory
Affairs
WorldCom, Inc.
1120 Connecticut Ave., N.W.
Suite 400
Washington, D.C. 20036

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, N.W.
Washington, D.C. 20007
Counsel for MFS Communications

Charles C. Hunter
Kevin S. DiLallo
Hunter & Mow, P.C.
1620 I Street, N.W.
Suite 701
Washington, D.C. 20006
Counsel for Telecommunications
Resellers Association

Carl W. Northrop
Bryan Cave LLP
700 Thirteenth St., N.W.
Suite 700
Washington, D.C. 20005
Counsel for AirTouch Paging

Mark Stachiw
AirTouch Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, TX 75251

J. Kristen Liesemer
Unitel Communications
200 Wellington Street West
Toronto, Ontario
M5V 3G2
CANADA

Gary L. Phillips
Ameritech
1401 H Street, N.W.
Suite 1020
Washington, D.C. 20005

John M. Goodman
Bell Atlantic Telephone
1133 20th Street, N.W.
Washington, D.C. 20036

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey
BellSouth Telecommunications
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Emily C. Hewitt
General Counsel
Vincent L. Crivella
Michael J. Ettner
Jody B. Burton
General Services Administration
18th & F Streets, N.W., Rm. 4002
Washington, D.C. 20405

William J. Balcerski
NYNEX
1111 Westchester Avenue
White Plains, NY 10504

David Cosson
Pamela Sower
National Telephone Cooperative
Association
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Judith St. Ledger-Roty
Lee A. Rau
Reed Smith Shaw & McClay
1301 K Street, N.W.
Suite 1100 East Tower
Washington, D.C. 20005
Counsel for Paging Network

Mark J. Golden
Vice President/ Industry Affairs
Personal Communications Industry
Association
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036

Lucille M. Mates
Sarah Rubenstein
Pacific Bell/Nevada Bell
140 New Montgomery Street
Room 1522A
San Francisco, CA 94105

James L. Wurtz
Margaret E. Garber
Pacific Bell/Nevada Bell
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Robert M. Lynch
Durward D. Dupre
J. Paul Walters, Jr.
Southwestern Bell
One Bell Center, Room 3520
St. Louis, MO 63101

David J. Budino
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Joe D. Edge
Sue W. Bladdek
Elizabeth A. Marshall
Drinker, Biddle & Reath
901 Fifteenth Street, N.W.
Washington, D.C. 20005
Counsel for Puerto Rico
Telephone

Eugene J. Baldrate
Director-Fed. Regulatory
Southern New England
Telephone Company
227 Church Street
New Haven, CT 06506

Linda Hamilton
CMA
1201 Mt. Kemble Avenue
Morristown, NJ 07960

Lisa M. Zaina
General Counsel
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

Mary McDermott
Linda Kent
Charles D. Cosson
U.S. Telephone Association
1401 H Street, N.W., Suite 600
Washington, D.C. 20005

Colleen L. Boothby
Laura F.H. McDonald
Levine, Blaszk, Block
and Boothby
1300 Connecticut Ave., N.W.
Suite 500
Washington, D.C. 20036
Counsel for 800 Users
Coalition

Lawrence F. Chesto
Director of Telecommunications
Systems
Aeronautical Radio
2551 Riva Road
Annapolis, MD 21401

T. Michael Jankowski
Gregory M. Scott
Colier, Shannon, Rill
and Scott
3050 K Street, N.W.
Washington, D.C. 20007

Wayne V. Black
C. Douglas Jarrett
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Counsel for the American
Petroleum Institute

Glenn S. Richards
Fisher, Wayland Cooper
Leader & Zaragoza
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006
Counsel for American Telegram
Association

Albert Halprin
Melanie Haratunian
Halprin, Temple, Goodman
and Sugrue,
1100 New York Ave., N.W.
Suite 650 East Tower
Washington, D.C. 20554
Counsel for AVIS Rent A Car

Edwin N. Lavergne
Darren L. Nunn
Ginsburg, Feldman and
Bress
1250 Connecticut Ave., N.W.
Washington, D.C. 20036

John V. Kenney
U.S. Strategies Corp.
for Charter Medical Group
1055 N. Fairfax St., Suite 201
Alexandria, VA 22314

Wayne C. Rapp
Vice President
Crestar Bank
7818 Parham Road
Richmond, VA 23294

Joel DeFabio, Esq.
2121 Ponce De Leon Blvd.
Coral Gables, FL 33134

Catherine Wang
William B. Wilhelm, Jr.
Swidler & Berlin
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Counsel for Enterprise
Rent-A-Car, Inc.

Invesco Funds Group
7800 East Union Street
Denver, CO 80237

Glenn B. Manishin
Christy C. Kunin
Blumenfeld & Cohen
1615 M Street, N.W., Ste. 700
Washington, D.C. 20036
Counsel for Nextlink, Inc.

Jeffrey D. Knowles
Gary D. Hailey
Venable, Baetjer, Howard
and Civiletti
1201 New York Ave. N.W.
Washington, D.C. 20005
Counsel for NIMA Int'l

Mark D. Olson
410 W. Badillo Street
2nd Floor
Covina, CA 91723

Joseph Edward Page
4365 Executive Drive
San Diego, CA 92121-2126

Cheryl A. Tritt
Joan E. Neal
Morrison & Foerster
2000 Pennsylvania Ave., N.W.
Suite 5500
Washington, D.C. 20006

Eric Fishman
Fletcher, Heald & Hildreth
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

Susan Drombetta, Manager
Scherers Communications
Group, Inc.
575 Scherers Court
Worthington, OH 43085

Gary V. Pack, Sr. Attorney
Service Merchandise
P.O. Box 24600
Nashville, TN 37202-4600

Telecompute Corporation
1275 K Street, N.W.
Suite G-9
Washington, D.C. 20005

Gregory M. Casey
Victoria A. Schlesinger
Telemation International
6707 Democracy Blvd.
Suite 800
Bethesda, MD 20817

David R. Poe
Leboeuf, Lamb, Greene &
MacRae
1875 Connecticut Avenue, N.W.
Suite 1200
Washington, D.C. 20009
Attorneys for Time Warner

Nathan Hart
Tellnet Communications
7611 Ehrlich Road
Tampa, FL 33625

Donna Roberts
MCI
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Rachel Rothstein
Dorota Smith
Cable & Wireless
8219 Leesburg Pike
Vienna, VA 22182

Richard Karre
U S West Communications
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Robert Keller
4200 Wisconsin Avenue, N.W.
#106-233
Washington, D.C. 20016
Counsel for ICB, Inc.

Loren Stocker
Vanity International
2020 Lincoln Park West
Suite 16J
Chicago, IL 60614

Bill Quimby
Toll Free Referral, Inc.
P.O. Box 946
Vernon, NJ 07462